

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

Case No. 1:21-md-3010 (PKC)

This Document relates to:

IN RE GOOGLE DIGITAL PUBLISHER
LITIGATION

Case No. 1:21-cv-7034 (PKC)

**MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR LEAVE TO FILE
EXHIBITS 1 AND 2 TO DECLARATION OF PHILIP C. KOROLOGOS UNDER SEAL**

Pursuant to this Court’s Individual Practice No. 5, Plaintiff MediaLab.AI, Inc., on behalf of Sterling International Consulting Group, The Nation Company, L.P., The Progressive, Inc., JLaSalle Enterprises LLC, and Mikula Web Solutions, Inc. (the “Publisher Class Plaintiffs”), files this Motion for Leave to File Exhibits 1 and 2 to Declaration of Philip C. Korologos under Seal. Along with the unredacted Proposed First Amended Consolidated Class Action Complaint (attached hereto as Exhibit 1), the Publisher Class Plaintiffs provide, to be publicly filed, potential redactions¹ consistent with this Court’s prior Orders dated October 15, 2021 [ECF No. 147], December 21, 2021 [ECF No. 192], and January 12, 2022 [ECF No. 194].

Per the Court’s Individual Practice 5(B)(iii), the Publisher Plaintiffs are filing their Proposed First Amended Consolidated Class Action Complaint with redactions, as well as an

¹ Pursuant to Pretrial Order No. 2 [ECF No. 309] and Pretrial Order No. 3 [ECF No. 311], the Publisher Class Plaintiffs are simultaneously filing their Motion for Leave to Amend Their Consolidated Class Action Complaint, along with Mr. Korologos’s accompanying declaration.

unredacted version related to this Motion under seal. The document does not contain personal information, employee names, and non-public technical product details, which were concerns the Court previously identified in its October 15 Order. Publisher Class Plaintiffs nevertheless make this motion to redact a broader set of allegations out of an abundance of caution, to ensure compliance with the Court's Interim Protective Order [ECF No. 192].

Publisher Class Plaintiffs wish to afford Google an opportunity to show cause why the public should be denied access to certain information designated confidential by Google. Accordingly, the Publisher Class Plaintiffs have designated in blue information pulled from Google's document productions that Google had broadly designed "confidential", which the Publisher Class Plaintiffs do not believe are confidential but filed under seal out of an abundance of caution.

Because the document does not contain personal information, employee names, or non-public technical product details, the Publisher Class Plaintiffs respectfully request the Court allow them to publicly file their First Amended Consolidated Class Action Complaint in its entirety without redaction.

Dated: October 5, 2022

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Philip C. Korologos

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**Pro Hac Vice*